

David A. Carroll (Nevada Bar No. 7643)
dcarroll@rrsc-law.com
Anthony J. DiRaimondo (Nevada Bar No. 10875)
adiraimondo@rrsc-law.com
Robert E. Opdyke (Nevada State Bar No. 12841)
ropdyke@rrsc-law.com
RICE REUTHER SULLIVAN & CARROLL, LLP
3800 Howard Hughes Parkway, Suite 1200
Las Vegas, Nevada 89169
Telephone: (702) 732-9099

Robert L. Wallan (*Pro Hac Vice*)
robert.wallan@pillsburylaw.com
PILLSBURY WINTHROP SHAW PITTMAN LLP
725 South Figueroa Street, 36th Floor
Los Angeles, California 90017-5524
Telephone: (213) 488-7163

Attorneys for Defendant/Counterclaimant
Findlay Management Group

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Houston Casualty Company, a foreign
corporation,

Plaintiff,

vs.

Findlay Management Group, a Nevada Domestic
Corporation,

Defendant.

Findlay Management Group, a Nevada Domestic
Corporation,

Defendant/Counterclaimant,

vs.

Houston Casualty Company, a Texas
corporation; Syndicate 2623 and Syndicate 623
at Lloyd's, English business entities; United
Specialty Insurance Company, a Delaware
corporation; Certain Underwriters at Lloyd's
London: Syndicate BRT 2987, an English
business entity; Syndicate KII 1618, an English

Case No. 2:24-cv-01459-GMN-NJK

**STIPULATION AND ORDER TO
EXTEND TIME FOR CERTAIN NEWLY-
ADDED COUNTERDEFENDANTS TO
RESPOND TO AMENDED
COUNTERCLAIM**

(FIRST REQUEST)

business entity; Syndicate KLN 510, an English business entity; Syndicate TMK 1880, an English business entity; Syndicate AUL 1274, an English business entity; Syndicate AES 1225, an English business entity; Aspen Specialty Insurance Company, a North Dakota corporation; Endurance American Specialty Insurance Company, a New York corporation; Lloyd's Underwriters Syndicate No. 4444 CNP (Acrisure); West Chester Surplus Lines Insurance Company (Chubb),

Counter-defendants.

Pursuant to LR IA 6-1, Counterclaimant Findlay Management Group and certain Newly-Added Counterdefendants¹ (collectively, the "Parties"), hereby stipulate and agree subject to the Court's approval to extend time to respond to the Amended Counterclaim (ECF No. 46) and Errata thereto (ECF No. 53). The Newly-Added Counter-defendants have varying deadlines to respond to the Amended Counterclaim, which are based on date of service for each counterdefendant and these deadlines currently fall between May 13, 2025 and May 23, 2025. This is the first request for extension concerning these deadlines.

Subject to the Court's approval, the Parties have agreed that the Newly-Added Counterdefendants shall have, up to and including May 30, 2025, to respond to the Amended Counterclaim (ECF No. 46) and Errata thereto (ECF No. 53). There is good cause to grant this additional time based on the need for a new party to get up to speed in this already existing litigation in which discovery has already commenced and is ongoing.

Good cause exists to grant this stipulation and it is submitted in good faith, is not interposed for delay, and is not filed for an improper purpose.

¹ The Newly-Added Counterdefendants for purposes of this stipulation are as follows: (1) United Specialty Insurance Company, Aspen Specialty Insurance Company, Endurance American Specialty Insurance Company, and Certain Underwriters at Lloyd's London Syndicates BRT 2987, KII 1618, KLN 510, TMK 1880, AUL 1274 and AES 1225 (collectively "Ambridge"); and (2) Westchester Surplus Lines Insurance Company (hereinafter "Chubb").

DATED: May 13, 2025

DATED: May 13, 2025

/s/ Nicholas R. Novak

Nicholas R. Novak, Esq.

BATESCAREY LLP

191 N. Wacker, Suite 2400

Chicago, IL 60606

Telephone: (312) 762-3266

Attorneys for Counterdefendant United Specialty Insurance Company, Aspen Specialty Insurance Company, Endurance American Specialty Insurance Company, and Certain Underwriters at Lloyd's London Syndicates BRT 2987, KII 1618, KLN 510, TMK 1880, AUL 1274 and AES 1225 (collectively "Ambridge")

/s/ Anthony J. DiRaimondo

David A. Carroll, Esq. (NSB #7643)

Anthony J. DiRaimondo, Esq. (NSB #10875)

Robert E. Opdyke, Esq. (NSB #12841)

RICE REUTHER SULLIVAN & CARROLL LLP

3800 Howard Hughes Parkway, Suite 1200

Las Vegas, Nevada 89169

Telephone: (702) 732-9099

-and-

Robert L. Wallan (*Pro Hac Vice Forthcoming*)

PILLSBURY WINTHROP SHAW PITTMAN LLP

725 South Figueroa Street, 36th Floor

Los Angeles, California 90017-5524

Telephone: (213) 488-7163

Attorneys for Defendant/Counterclaimant Findlay Management Group

///

///

///

///

///

///

///

1 DATED: May 13, 2025

2
3 /s/ Matthew W. Casey

4 Matthew W. Casey, Esq.

5 **WALKER WILCOX MATOUSEK LLP**

6 One North Franklin St., Suite 3200

7 Chicago, IL 60606

8 Telephone: (312) 244-6722

9 *Attorneys for Counterdefendant Westchester*

10 *Surplus Lines Insurance Company*

11 (*"Chubb"*)

12 **Order**

13 The Newly-Added Counterdefendants that are parties to this Stipulation shall have, up to and
14 including May 30, 2025, to respond to the Amended Counterclaim (ECF No. 46) and Errata thereto
15 (ECF No. 53).

16
17
18 **IT IS SO ORDERED.**

19
20 
21 **UNITED STATES DISTRICT JUDGE/
UNITED STATES MAGISTRATE JUDGE**
22 **Dated: May 14, 2025**